

COMMENTS FOR THE PSC HEARING ON OCT. 17, 2006

Good morning. My name is Chad Tolman. I lead an interdenominational group called Citizens Concerned about Climate Change, and work with a number of other religious, environmental, and civic organizations.

Earlier this year customers of Delmarva Power were shocked and angered to learn that their electric rates were going up about 60%, when they had been told that deregulation would lead to more competition and lower prices. Most Delaware legislators had voted for deregulation, and letters-to-the-editor were saying, "Kick the bums out!" The legislators responded with H.B. #6,ⁱ which asked Delmarva Power to draft a Request for Proposals (RFP) for new electrical generation based on five criteria:

1. Energy price stability
2. Reductions in environmental impact
3. Benefits of adopting new and emerging technology
4. Siting feasibility
5. Terms and conditions concerning the sale of energy output from such facilities.

The Independent Consultant's Final Report clearly misses the intent of the legislation. It awards the largest number of the points (40 of 100) that will determine who will get a long-term power purchase agreement to the company with the lowest current cost of electrical energy. Though the report did make some marginal changes in directions suggested by those making public comments at the workshop on August 18 and submitted by

October 3 on the Independent Consultant's Draft Report, it missed the main point, which is the need to answer the following question:

To meet an increasing demand for electricity, do we want to build another coal plant in Delaware—with its associated emissions of CO₂ and other pollutants--or do we want to chose a different path, one based on increased energy efficiency and renewable energy sources, with the long-term goal of eliminating greenhouse gas emissions, protecting our state's people and wildlife, and creating new industries and jobs? That is the choice that will be made by the terms of this RFP.

The companies wanting to build a large new coal power plant savor the large number of points to be given to the lowest current cost of electrical energy. Coal is dirty, but it's cheap—if you don't count the costs of lost work-time, hospitalizations, medical care and increased educational expenses of neurological damaged children from the emissions of SO_x, NO_x, fine particulates and mercury, or the loss of homes, businesses, churches, schools and hospitals that will occur as temperatures and sea levels rise with increasing atmospheric concentrations of CO₂. The coal-based companies would like to see the lowest current cost producer get the contracts, while they ignore the urgent warnings of the world's leading scientists on the need to act soon to reduce global warming if we are to avoid a dangerous tipping point, and pass on the costs--health impacts, carbon taxes (which are sure to come as the damage from climate change increases), and the equipment needed for carbon capture and sequestration--to the local citizens and rate payers. This is a classic case of 'bait and switch', leaving Delawareans holding the bag as their costs rise ever higher. This is surely not what the Delaware Legislature intended.

The consultant's report takes an approach based on last century's model for energy and its environmental impacts—not this century's. This is a new century: the Greenhouse Century. Many religious faiths have spoken out about the need to stop doing business-as-usual, and to preserve and protect God's creation and the poorest among us, who are already suffering from climate change. My denomination, the Unitarian Universalist Association of Congregations, adopted a **Statement of Conscience on the Threat of Global Warming/Climate Change** at its General Assembly meeting this summer. It said, in part,

“Earth is our home. We are part of this world and its destiny is our own. ... We declare by this Statement of Conscience that we will not acquiesce to the ongoing degradation and destruction of life that human actions are leaving to our children and grandchildren. We as Unitarian Universalists are called to join with others to halt practices that fuel global warming/climate change, to instigate sustainable alternatives, and to mitigate the impending effects ... with just and ethical responses. As a people of faith, we commit to a renewed reverence for life and respect for the interdependent web of all existence.”ⁱⁱⁱ

In support of this strong Statement of Conscience, I coauthored a document, titled, **The Science Behind the Threat of Global Warming/Climate Change**, which is available on the web.ⁱⁱⁱ You should read it if you want to understand why global warming is taking place, what it means for our future, and why it is necessary to act now—not decades from now—to slow, then reverse and ultimately eliminate the emission of CO₂ and other greenhouse gases into Earth's atmosphere.

The ethical and religious concern is not limited to Unitarians. The United Council of Churches has an Interfaith Climate Change Campaign^{iv} and an electronic Interfaith Climate Change Network, co-sponsored by the National Council of Churches' Eco-Justice Working Group and the Coalition on the Environment and Jewish Life.^v

The Independent Consultant's Final Report does not contain the phrases, 'climate change' or 'global warming' anywhere in its 69 pages. Global warming is the 900-pound gorilla coming down the street, which the Independent Consultant has chosen to ignore. The phrase 'greenhouse gas' appears on p. 57, where the Regional Greenhouse Gas Initiative (RGGI) is mentioned in passing but then ignored, on p. 58, where low greenhouse gas emissions are given only 4 out of 100 points, and on p. 72, where it is recommended that the seller assume the cost of emissions only if they are above the average for the PJM Classic market—not much of a risk. 'Carbon dioxide' appears only once, on p. 21. Emissions of greenhouse gases—particularly CO₂—are going to be a major factor in price stability, costs to consumers, and environmental impacts, which will greatly increase with time.

What Delmarva does now with new electrical generation should be part of a long-range plan that includes the RGGI, which will stabilize carbon dioxide emissions from the region's power plants at current levels from 2009 to 2015, followed by a 10% reduction in emissions by 2019;^{vi} Delaware's Renewable Energy Portfolio Standard, which commits the state to increasing its electrical energy from renewable sources from 1% in 2007 to 10% in 2019;^{vii} and a plan to eventually eliminate all emissions from fossil fuel use in Delaware. California and 10 other states have already agreed to cut their CO₂ emissions from all

sources to 20% of their 1990 values by 2050.^{viii} Delaware should do at least as much. We are particularly vulnerable to sea level rise, which was a foot at Lewes during the past century and is very likely to rise by two to four feet, and perhaps much more, by the end of the next. A 20-inch rise would inundate half of Delaware's marshes and wetlands, and do severe damage to its beaches and tourism industry.^{ix} Complete melting of Greenland's glaciers, to which we might be committed by mid-century under a business-as-usual scenario, would raise sea levels by over 20 feet.^x We don't need to go down that road. Let's not do it.

We need to start by getting the terms of the Delmarva RFP right. I propose that it be a **Threshold Requirement** that any new electrical generating plant built in Delaware using coal as a fuel must use the best available control technology to minimize emissions of carbon dioxide as well as the conventional pollutants—SO_x, NO_x, fine particulates and mercury. That means carbon capture and sequestration, and scrubbing, from startup – not at some possible future date. Let's begin now to build a clean energy future for Delaware--for the sake of the children.

Sincerely,

Chad Tolman

Coalition for Climate Change Study and Action

REFERENCES

ⁱ H.B. #6 of the 143rd General Assembly, **An Act to Amend Title 26 of the Delaware Code Concerning the Oversight of Public Utilities that Distribute and Supply Electricity to Retail Electric Customers in the State**, at: <http://www.legis.state.de.us/LIS/LIS143.NSF/vwLegislation/HB+6?Opendocument>

ⁱⁱ **Threat of Global Warming/Climate Change Statement of Conscience**, http://www.uua.org/csw/SOCFinal06_GW.pdf

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- iii **The Science Behind the Threat of Global Warming/Climate Change.**
<http://www.uumistryforearth.org/globalwarming/ScienceBehindGlobalWarming.pdf>
- iv **Interfaith Climate Change Campaign**, at:
<http://www.nccusa.org/news/01news30.html>
- v **Interfaith Climate Change Network**, at:
www.protectingcreation.org
- vi **Regional Greenhouse Gas Initiative (RGGI)** at:
<http://www.rggi.org/index.htm>
- vii S.B. #74 of the 143rd General Assembly, **An Act to Amend Title 26 of the Delaware Code Relating to Renewable Energy Portfolio Standards**, at:
<http://www.legis.state.de.us/LIS/LIS143.NSF/93487d394bc01014882569a4007a4cb7/f225535c161dfaa485256f9400609811?OpenDocument>
- viii J. Eilperin, **Cities, States Aren't Waiting for U.S. Action on Climate Change**, *Washington Post*, p. A01, Aug. 11, 2006, at:
<http://www.washingtonpost.com/wp-dyn/content/article/2006/08/10/AR2006081001492.html>
- ix **Climate Change and Delaware**, EPA 230-F-97-008h.
U.S. Environmental Protection Agency, Global Warming – Impacts, Coastal Zones, at: <http://yosemite.epa.gov/oar/globalwarming.nsf/content/impactscoastalzones.html>.
- x Richard Z. Poore et al., **Sea Level and Climate**, *US Geological Survey*, Fact Sheet 002-000, January 2000. <http://pubs.usgs.gov/fs/fs2-00/>